Environmental Protection Agency April 8, 1985.
Region X
1200 Sixth Avenue
Seattle, WA 98101

To: Director
From: (b) (6) resident of Kent, Washington, interested party.
Subject: Comment on Western Processing property clean-up.

I offer the following comments and suggestions for consideration in the current interest in detoxification and neutralization of certain contaminated soils in and abutting the property of Western Processing, Incorporated.

In recent open meetings conducted at the Kent City Hall (I was present at only two of three I am aware of, viz.,April 4 and March 28) alterrative methods of treatment were offered.

As preamble, the use of well samples to identify kind and quantity of contamination at relatively arbitrary depths was announced and graphically presented to the audience. In explantion it was often remarked that conclusions were "assumed to be" and left an element of doubt in the mind of an objective listener that such conclusions were not substantially certain and could be misleading or questionable, at least.

Among the alternative methods suggested for clean-up, back-flushing was perhaps the most reasonable. However, it is my opinion that physical condition of the affected soils has developed over a period of time and under conditions which allowed for maximum penetration at minimum depth, accompanied by continuing chemical changes in the induced substances by elements indigenous to the geological structure's content.

If this newly developed structure now contains not only the substantive inventory of its original state but the induced elements and/or substances in whatever toxic form identifiable as a part of the inventory of Western Processing, plus the presence of one or a diverse collection of substances not indigenous to the geological structue native to the area it is quite possible that back-flushing will not be as effective a method as it may appear.

There were valid observations made in regard to the content and viability of noxious substances and the development and analyses of wells and samples indicate the presence of declared toxic substances that pose a threat to the public.

The declared goal of the particpants in the clean-up process is to rid the site of this threat.

Costs are projected to as much as $1.35 million and time for work estimated at from five to ten years.

No mention was made of the possibility of subjecting the soils to controlled high heat (incineration). This is a method that should be given serious consideration.

I raised the question at the April 4 meeting and was told "the metals would remain". I id not have enough facts at my disposal at the time and could not carry the argument further. However, subsequent discussions with some professional engineers, I am sure the method has merit.

If temperatures in a controlled combustion chamber can be maintained up to 5000 degrees Fahrenheit the most toxic of ehe metals will be rendered inert and any ash/slag residue will remain on site as backfill.

In developing a more exact profile of the site in order, first, to substantiate and quantify the presence (or absence) of identifiable substances, a series of core samples ahould be taken at enough equidistant test holes to be able to chart a series of two-dimensional graphs identifying the substance, the measured quantiy (concentration), the measured depth, and, as a control profile, the peripheral holes at a distance at which the induced WP contaminants had not appeared.

The suggestion to divert the flow of Hill Creek is to be considered seriously. Inasmuch as the major portion of the site is interdicted by the stream, and major rainfall in the valley contributes to its level, such implied runoff threatens to be a handicap to control of the contamination, e. i., its continuing spread downstream. Diversion by flume or subsurface conduit is indicated during the period of clean-up.

A pit burner might be considered as a combustion facility, utilizing a moving grate and conveyor belt feed. Construction should be at the point on the property showing the least concentration of contaminants, probably at the Asphzlt Pad. However, design features permitting volume input to the furnace may preclude practical structure on site.

Is it possible to address the current problem (WP) in terms of the State's apparent need for a cogent approach to hazardous and toxic wastes as well as the developing crisis in solid waste management and disposal?

I am ready to accede and accept the choice of an effective method, presuming the assumptions noted be re-evaluated and in an attempt to quell negative attitudes.

Respedtfully submitted,

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